



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 22, 2006

Reply To
Attn Of: ETPA-088

Ref: 99-004-AFS

Larry Donovan
Mt. Baker-Snoqualmie National Forest
21905 64th Avenue West
Mountlake Terrace, WA 98043

Dear Mr. Donovan:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for **The Summit at Snoqualmie Master Development Plan (MPD) Proposal** (CEQ No. 20080467) in accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS considers the five alternatives identified in the Draft EIS (DEIS), with some changes. The Selected Alternative, identified and rationalized in the ROD, is a modified version of "Modified Alternative 5 – Mitigated Proposed Action".

In our February 21, 2006 comment letter on the DEIS EPA expressed concerns with (i) the rationale for level of Comfortable Carrying Capacity increase, (ii) impacts to Late Successional Habitat (LSH), (iii) water quality and wetlands impacts, (iv) long-term impacts to Drainages of Particular Concern (DPC), (v) the Annual Monitoring Plan and individual project scrutiny, and (vi) the lack of targeted measurable outcomes for restoration projects. We appreciate the thoughtful responses to our own and other comments provided by the Forest Service in FEIS Volume 5.

EPA supports, especially, that the Selected Alternative:

- avoids the most potentially significant impact to habitat connectivity by not including construction of the *Creek Run* chairlift,
- mitigates impacts in Riparian Reserves and Section 16 through Mitigation Measure MM2 (ROD, Table ROD-A-1),
- includes all of the restoration projects in Tables 5-1 and 5-2 (FEIS, Vol. 4, Appendix F) and
- emphasizes the importance of the monitoring requirements referenced in the ROD's Appendix A.

The above elements of the Selected Alternative, among numerous other elements and decisions described throughout the FEIS and ROD, generally decrease the environmental impacts of

development at The Summit-at-Snoqualmie while meeting public expectations for quality alpine skiing and dispersed recreation.

One potential method for further decreasing The Summit-at-Snoqualmie's environmental impacts is to emphasize the reduction of DPC parameter threshold exceedances. Prioritizing and designing restoration projects based on the useful DPC analysis presented in Chapter 4 and Appendix I of the FEIS would serve to further connect restoration with targeted measurable outcomes. We believe that targeted measurable outcomes, like reducing a particular DPC parameter threshold exceedance (e.g. "The modified channel length parameter would be reduced to below threshold due to these restoration projects for the Beaver drainage" (FEIS, 4-175)), help to encourage and guide effective restoration.

As a consideration for the future of this project and others, EPA notes that global climate change will have a negative impact on skiing in Washington¹. Delayed season openings, shorter seasons and rising snowlines² will likely necessitate adaptation by ski area operators in the Cascades if they want to continue and meet public expectations for quality alpine skiing. Some of these adaptations, like the diversion and storage of water for snowmaking, may have environmental impacts and we encourage the USFS to include a discussion of the reasonably anticipated impacts of climate change on projects or programs such as ski area Master Development Plan proposals.

We appreciate the complexity of balancing the need for quality recreation with environmental protection and commend you and your team for considering a vast array of concerns. Thank you for this opportunity to comment and if you have questions concerning this review please contact Erik Peterson at (206) 553-6382 or by email at peterson.erik@epa.gov.

Sincerely,

/S/

Christine B. Reichgott, Manager
NEPA Review Unit

¹ See: <http://climlead.uoregon.edu/linksresources/CCMisc/cig.ppt#555,24>, Warmer winters have a negative impact on skiing in Washington

² See page 10 of Casola, 2008 at http://ams.allenpress.com/archive/1520-0442/preprint/2008/pdf/10.1175_2008JCLI2612.1.pdf